


# COHEN & GREEN

May 27, 2022

District Judge Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

SO ORDERED.



LEWIS J. LIMAN  
United States District Judge

By Electronic Filing.

5/27/2022

**Re: Carol Lopez v. City of New York, et al., 20-cv-2502-LJL**

Dear Judge Liman:

My firm represents the Plaintiff in this matter. I write jointly with Defendants to ask for an extension of the current discovery schedule. This is the third such motion.

By way of background, the Court previously granted two extensions — and Defendants currently have a combination motion to dismiss and motion to stay *Monell* discovery pending. Plaintiff has not moved to compel *Monell* discovery in light of that motion, but no *Monell* discovery has been exchanged. Additionally, Plaintiff very recently had a knee surgery related to this incident, and the parties are in the process of obtaining and exchanging related records and releases.

With that background, we suggest that the Court enter a contingent extension — shifting the current discovery schedule out *sine die*, to be solidified based on the resolution of Defendants' motion to stay and dismiss. Following that order, the parties will quickly consult and file a proposed new schedule.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

*Honorific/ Pronouns: Mx., they/ their/ them*

**COHEN & GREEN P.L.L.C.**

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cc:

All relevant parties by ECF and Email.